

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

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*Counsel for Williams Hart Boundas Easterby LLP,
on Behalf of Certain Personal Injury Claimants*

In Re:

LTL MANAGEMENT LLC,

Debtor.

Case No.: 21-30589 (MBK)

Chapter: 11

Judge: Michael B. Kaplan

**VERIFIED STATEMENT OF WILLIAMS HART BOUNDAS EASTERBY, LLP
PURSUANT TO BANKRUPTCY RULE 2019**

Pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Williams Hart Boundas Easterby, LLP (“Williams Hart”), representing (as the term “represent” is defined in Bankruptcy Rule 2019) certain personal injury claimants against the

Debtors, identified on Exhibit A hereto (collectively, the “Williams Hart Claimants”), hereby submits this verified statement (this “Verified Statement”), and in support hereof states as follows:

1. Each of the Williams Hart Claimants has, individually, retained Williams Hart to represent him or her as counsel in connection with, among other things, Talc Personal Injury Claims against the debtor or certain of its subsidiaries and affiliates (collectively, the “Debtor”).

2. Williams Hart retained Andrews Myers, P.C., as special bankruptcy counsel and retained Pryor Cashman, LLP as local bankruptcy counsel.

3. While the Williams Hart Claimants comprise the current clients of Williams Hart on whose behalf Williams Hart is taking positions before the Court, Williams Hart may in the future take positions before the Court on behalf of, or be engaged by other talc personal injury claimants, Williams Hart does not represent the Williams Hart Claimants as a “committee” or a “group” (as such terms are used in the Bankruptcy Code and the Bankruptcy Rules) and does not undertake to represent the interests of, and are not fiduciaries for, any creditor, party in interest, or other entity that has not signed a retention agreement with Williams Hart.

4. The names of each of the Williams Hart Claimants, as of the date of this Verified Statement, together with the nature of the claim and the amount (which is unliquidated) of the disclosable economic interests held by each of them in relation to the Debtor, are set forth in Exhibit “A” attached hereto. In addition, pursuant to the Bankruptcy Court’s Order dated May 25, 2022 [Doc. 2352], Exhibit “A” also includes the home addresses, type of disease and stage of disease (if known) for each of the Williams Hart Claimants, but such information has been filed under seal. The Williams Hart Claimants listed on Exhibit “A” have not yet filed proofs of claim in these cases and no deadline requiring them to do so has been set. The fact that proofs of claim have not been filed at this time by the Williams Hart Claimants shall not be deemed a waiver of

any claims by such holders of Talc Personal Injury Claims against the Debtors or their estates, or of any other right or claim.

5. Each of the Williams Hart Claimants have signed an agreement which empowers the law firms of Williams Hart Boundas Easterby, LLP and Avram Blair & Associates, PC to act on their behalf. An exemplar of the agreement that was signed by each Williams Hart Claimants is attached hereto as Exhibit “B” and verified as a true and accurate copy of the exemplar agreement. The fee arrangement contained in Exhibit “A” is redacted and filed under seal per the Bankruptcy Court’s May 25, 2022 order [Doc 2352].

6. Nothing contained in this Verified Statement is intended or shall be construed to constitute: (i) a waiver or release of the rights of any of the Williams Hart Claimants to have any final order entered by, or other exercise of the judicial power of the United States performed by, an Article III court; (ii) a waiver or release of the rights of any of the Williams Hart Claimants to have any and all final orders in any and all non-core matters entered only after a de novo review by a United States District Judge; (iii) consent to the jurisdiction of the Court over any matter; (iv) an election of remedy; (v) a waiver of release of any rights of any of the Williams Hart Claimants may have to a jury trial, whether in state or federal court; (vi) a waiver or release of the right to move to withdraw the reference with respect to any matter or proceeding that may be commenced in these chapter 11 cases against or otherwise involving any of the Williams Hart Claimants; (vii) a waiver or release of any other rights, claims, actions, defenses, setoffs, or recoupments to which any of the Williams Hart Claimants are or may be entitled, in law or in equity, under any agreement or otherwise, with all such rights, claims, actions, defenses, setoffs, or recoupments being expressly reserved; or (viii) a waiver or release of any of the Williams Hart Claimants’ rights under 28 U.S.C. §157(b)(5) to have any of their personal injury tort or wrongful death claims tried in the

district court in which the bankruptcy case is pending, or in the district court in the district in which the claim arose, as determined by the district court in which the bankruptcy case is pending.

7. Williams Hart reserves the right to amend or supplement this Verified Statement in accordance with the requirements of Bankruptcy Rule 2019 at any time in the future.

8. The undersigned verifies that the foregoing is true and correct to the best of its knowledge.

Dated: June 8, 2022

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